

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF TEXAS,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

V.

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED  
PARENTHOOD SOUTH TEXAS,  
INC., PLANNED PARENTHOOD  
CAMERON COUNTY, INC.,  
PLANNED PARENTHOOD SAN  
ANTONIO, INC.,

Defendants.

**PARTIES' JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

The State of Texas and Relator Alex Doe (“Plaintiffs”) and Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San

Antonio, Inc. (“Defendants”), respectfully move this Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, to enter the Parties’ Joint Proposed Protective Order attached hereto as Exhibit 1.

Per the Court’s Order granting in part Plaintiffs’ Motion for Entry of Protective Order (ECF No. 124), the parties have conferred and hereby submit the Parties’ Joint Proposed Protective Order attached hereto as Exhibit 1.

WHEREFORE, the Parties respectfully request that their Joint Motion for Entry of Protective Order be Granted and the Parties’ Joint Proposed Protective Order be entered in this matter.

Dated: July 19, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on July 19, 2022, causing electronic service on all counsel of record.

/s/ Raymond C. Winter  
**Raymond C. Winter**